

## REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

### I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 143-148 are currently pending. Claims 143 and 146 are independent and are hereby amended. No new matter has been introduced. Support for this amendment is provided throughout the Specification as originally filed.

Changes to the claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

### II. REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 143-148 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 5,148,154 to Mackay et al. (hereinafter, merely "Mackay") in view of U.S. Patent No. 5,537,528 to Takahashi et al. (hereinafter, merely "Takahashi") and further in view of U.S. Patent No. 5,644,740 to Kiuchi.

Applicants respectfully traverse these rejections in view of the amendments made herein above.

Independent claim 143, as amended, is representative and recites, *inter alia*:

“user interface means for displaying and controlling graphical user interfaces corresponding to processing performed by said edit module, said composite processing module, and said special effect module; the graphical user interfaces including a clip tree window for graphically displaying said tree structure for said plurality of clips;

...  
wherein the editing system assigns a clip name for each clip in said tree structure, the clip name comprised of an attribute indicating whether the clip is a material clip or a resultant clip and a clip identification code; (Emphases added).

The Office Action cites Kiuchi for disclosing this element. Office Action of July 24, 2006 states, “Kiuchi teaches a system of displaying information in a hierarchical tree window indicating the type of information contained within the node (Kiuchi, FIG. 17; col. 16, lines 13-25).” The user-defined “information contained within the node” of Kiuchi is inapposite to the present invention as discussed below.

Kiuchi discloses a method for a user to locate information in a knowledge-base through a hierarchical display. In a hierarchical knowledge-base, concepts are linked together in a “is-a” relation and a “part-whole” relation. Col. 1, lines 45-64. Each concept can have multiple “is-a” relations and multiple “part-whole” relations. In the knowledge-base, items are expressed in terms of two concepts and one relation, *i.e.*, binary relation. Col. 2, lines 6-11.

The Kiuchi method classifies concepts (data) on the “is-a” relation defined in advance and on a relation (attribute) appended to them by the user, allowing the user to alter the hierarchical tree to meet the user's intention. Col. 4, line 65 to col. 5 line 8. The user specifies a relation (attribute) as a classification representative node on a concept tree of is-a relation to re-define a taxonomic system of concepts. The classification representative node is named by the user, e.g., “company classified by seat.” The knowledge-base is arranged in a hierarchical

structure; the nodes identify relations between concepts a subset of which are selected by a user. The nodes enable a user to select subsets of conceptual relationships. FIG. 17 is derived from FIG. 16 wherein “person” and “company” are added as conceptual nodes and the rearranged according to their sub-concepts. The user can alter the view the taxonomic system by selecting the classification representative node,. Col. 12 lines 10-22 and FIG. 1.

In contrast, claim 143 recites, “wherein the editing system assigns a clip name for each clip in said tree structure, the clip name comprised of an attribute indicating whether the clip is a material clip or a resultant clip and a clip identification code.” First, in the present application, (1) the editing system assigns a clip name, and (2) the assigned clip name comprises of an indicator of the type of clip (material or resultant) and a clip identification code. Hence, in the present invention, the editing system determines the hierarchical relationship among clips and assigns the clip name that indicates that relationship including a clip identifier.

In the present invention the clips are arranged in the hierarchical structure according to the type of clip. There are at least two types of clips in the hierarchy: material clips and resultant clips. “Material clips” are audio/video material produced by only cutting out from the source video data. “Resultant clips” are material produced by editing the material clips. In the present invention, the clip name identifies whether the clip is a material clip or a resultant clip. The type of clip and, therefore, the clip name is not user-defined nor does the clip name alter the relationship between clips as in Kiuchi. Indeed, the clip name is assigned by the editing system. The clip name is a necessary result of the type clip, not from a user-defined relationship as in Kiuchi.

Second, the clip name is assigned by the editing system and claim 143 recites, “the clip name comprised of an attribute indicating whether the clip is a material clip or a resultant clip

and a clip identification code.” Thus, the editing system assigns a clip name for identifying the clip, which is added to the clip and includes (1) the attribute of a clip is data for identifying whether the clip is only a material clip or the clip is a resultant clip produced by editing a material clip, and (2) the clip ID code is an identification number of the serial number automatically added to the clip in the order of being registered as a clip. Pub. App. pars. [0232]-[0234].

Neither Mackay nor Takahashi adds the elements discussed above missing from Kiuchi.

Claim 143, as amended, is patentable over Mackay, Takahashi and Kiuchi because those references taken alone or in combination do teach or suggest each and every element recited in the claim. In particular, Mackay, Takahashi and Kiuchi do not teach or suggest an editing system “wherein the editing system assigns a clip name for each clip in said tree structure, the clip name comprised of an attribute indicating whether the clip is a material clip or a resultant clip and a clip identification code” as recited in claim 143.

For reasons similar or somewhat similar to those described above with regard to independent claim 143, independent claim 146 is also believed to be patentable.

### **III. DEPENDENT CLAIMS**

The other claims are dependent from one of the claims discussed above and are therefore believed patentable for at least the same reasons. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

**CONCLUSION**

Claims 143-148 are in condition for allowance. In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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